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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CITY OF RICHMOND AND THE RICHMOND
JOINT POWERS FINANCING AUTHORITY,

Plaintiffs,

v.

ROYAL BANK OF CANADA, JP MORGAN
CHASE, PUBLIC RESOURCES ADVISORY
GROUP, AND THE MAJORS GROUP

Defendants.

No. 3:25-cv-03348-CRB

AMENDED
JOINT STIPULATION AND ~~PROPOSED~~
ORDER REGARDING CASE
MANAGEMENT DEADLINES

CITY OF RICHMOND AND THE RICHMOND
JOINT POWERS FINANCING AUTHORITY,
EX REL. DAVID ALESHIRE, CITY
ATTORNEY FOR THE CITY OF RICHMOND,
CALIFORNIA

Plaintiffs,

V.

ROYAL BANK OF CANADA AND JPMORGAN
CHASE & CO.,

Defendants.

No. 3:25-cv-03380-CRB

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Civil Local Rule 6-2, Plaintiffs City of Richmond and Richmond Joint Powers Financing Authority (collectively, “Plaintiffs”) and Defendants Royal Bank of Canada and Public Resources Advisory Group (collectively, “Defendants,”¹ and, together with Plaintiffs, “the Parties”), by and through their counsel, hereby stipulate as follows:

WHEREAS, on June 23, 2025, the Court entered the Parties’ Joint Stipulation to Extend Current Case Deadlines (ECF No. 21);

WHEREAS, pursuant to the deadlines established by ECF No. 21, on July 9, 2025, Plaintiffs filed an amended complaint in this Action (the “Unjust Enrichment Action”) (ECF No. 22); on July 30, 2025, the Parties met and conferred regarding initial disclosures, early settlement, ADR process selection, and discovery plan; and on July 30, 2025, the Parties filed ADR Certifications (ECF Nos. 23-25);

WHEREAS, on August 12, 2025, the Court entered a stipulation staying the remaining case deadlines established by ECF No. 21 because the City Attorney for the City of Richmond, the prosecuting authority for Plaintiffs (“Plaintiffs’ Prosecuting Authority”), filed a California False Claims Act case against Royal Bank of Canada and JPMC based on allegations related to this action that remained under seal (the “CA FCA Action”), and the parties to the Unjust Enrichment Action agreed that, once the CA FCA Action was unsealed, they would seek relation of the two actions (ECF No. 27);

WHEREAS, on September 30, 2025, the parties to the Unjust Enrichment Action moved to relate the CA FCA Action to this case (ECF No. 28);

WHEREAS, on October 1, 2025, the Court entered an order relating the CA FCA Action to this case (ECF No. 30);

WHEREAS, the parties to the two actions met and conferred and determined that, since Plaintiffs’ Prosecuting Authority intended to amend the complaint in the CA FCA Action, the parties

¹ Though named as a defendant in the caption above, the Amended Complaint, ECF No. 22, no longer asserts any claims against JPMorgan Chase Bank N.A. (“JPMC”), which is no longer a party to this Action. Further, despite numerous attempts, Plaintiffs have not yet been able to effectuate service on defendant The Majors Group.

should wait to set further deadlines until after the amendment is filed so that they can confer regarding whether they will stipulate to consolidate the actions and, if so, for what purposes;

WHEREAS, the Court entered a stipulated order providing a deadline of December 5, 2025 for Plaintiffs' Prosecuting Authority to file an amended complaint in the CA FCA Action and a deadline of 14 days after the amended CA FCA Action complaint is filed for the parties to jointly propose new case management deadlines to replace the deadlines in ECF No. 21 that this Court stayed in ECF No. 27 (ECF No. 34);

WHEREAS Plaintiffs' Prosecuting Authority filed an amended complaint in the CA FCA Action on December 5, 2025, the parties conferred regarding new case management deadlines and coordination with the CA FCA action, and the parties stipulated to extend their time to propose new case management deadlines to December 23, 2025 (ECF No. 38);

NOW, THEREFORE, THE PARTIES STIPULATE TO AND PROPOSE the following case management deadlines:

- ~~January 16, 2025~~ ^{February 13, 2026}: Deadline to file Joint Case Management Statement
February 20, 2026 at 8:30 a.m. by video conference
- ~~January 23, 2025~~: Initial Case Management Conference

Submitted this 23rd Day of December, 2025.

KELLER ROHRBACK L.L.P.

By s/ Matthew S. Melamed

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*Attorneys for Defendant JPMorgan Chase & Co.
(Defendant only in No. 3:25-cv-03380-CRB)*

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

2
3
4 ~~December 31, 2025~~
Date


The Honorable Charles R. Breyer, Senior District Judge
United States District Court for the Northern District of
California